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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CureIS Healthcare, Inc.,

Plaintiff,

v.

Epic Systems Corporation,

Defendant.

Case No.: 3:25-cv-04108-MMC

**DEFENDANT'S SECOND
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

Judge: Hon. Maxine M. Chesney

Pursuant to Civil Local Rules 7-11 and 79-5(f), Defendant Epic Systems Corporation (“Epic”) submits this administrative motion to consider whether another party’s material should be sealed (“Second Administrative Motion”), filed in connection with Defendant’s Notice of Motion and Motion to Partially Unseal CureIS HealthCare, Inc’s (“CureIS”) Complaint (Epic’s “Motion to Unseal”), Declaration of Lauren A. Moskowitz in Support of Defendant’s Motion to Unseal (“Moskowitz Declaration”), and Exhibits A-J accompanying the Moskowitz Declaration. The portions of documents Epic seeks to temporarily file under seal are listed below:

Document	Corresponding Page and Line Number(s)
Motion to Unseal	Page 2-3, Lines 14-2
Motion to Unseal	Page 3, Lines 4-5
Motion to Unseal	Page 3, Lines 8-15
Motion to Unseal	Page 7, Line 12
Motion to Unseal	Page 10, Line 11, Fn. 5
Motion to Unseal	Page 10, Line 19
Motion to Unseal	Page 11, Lines 2-4
Motion to Unseal	Page 11, Lines 8-11, Fn. 6
Motion to Unseal	Page 11, Lines 13, 15
Moskowitz Declaration	Page 1, Lines 19, 21-22
Moskowitz Declaration	Page 1, Lines 24-25, 27
Moskowitz Declaration	Page 2, Lines 1-2, 4
Moskowitz Declaration	Page 2, Lines 6-7, 9
Moskowitz Declaration	Page 2, Lines 12-14
Moskowitz Declaration	Page 2, Lines 17-19
Moskowitz Declaration	Page 2, Lines 22-24
Moskowitz Declaration	Page 2-3, Lines 27-2
Moskowitz Declaration	Page 3, Lines 5-6
Moskowitz Declaration	Page 3, Lines 9-10

Document	Corresponding Page and Line Number(s)
Exhibit A to Moskowitz Declaration	Document in its entirety
Exhibit B to Moskowitz Declaration	Document in its entirety
Exhibit C to Moskowitz Declaration	Document in its entirety
Exhibit D to Moskowitz Declaration	Document in its entirety
Exhibit E to Moskowitz Declaration	Document in its entirety
Exhibit F to Moskowitz Declaration	Document in its entirety
Exhibit G to Moskowitz Declaration	Document in its entirety
Exhibit H to Moskowitz Declaration	Document in its entirety
Exhibit I to Moskowitz Declaration	Document in its entirety
Exhibit J to Moskowitz Declaration	Document in its entirety

Epic brings this Second Administrative Motion to seal solely because it is required under the Civil Local Rules. *See* Civil L.R. 79-5(f). As detailed in Epic’s Motion to Unseal, Epic seeks the unsealing of the customer-identifying information that Magistrate Judge Kim previously permitted to be filed in redacted form. (*See* Dkt. No. 5 at 1.) This information should not be redacted as CureIS has failed to establish compelling reasons supporting redaction, including because (i) CureIS itself affirmatively publicly disclosed customer names for many years on its own website and elsewhere to market its products, and (ii) CureIS has not advanced particularized reasons supported by facts sufficient to meet its burden to justify sealing. In addition, there is a strong public interest in this matter and CureIS should not be able to engage in an attempted smear campaign while at the same time withholding critical information from the public regarding its core allegations so that the public can assess the veracity of CureIS’s claims. Epic’s Motion to Unseal is currently scheduled to be heard on August 8, 2025 at 9:00 a.m.

Nonetheless, given that Magistrate Judge Kim’s order currently remains in place, Epic provisionally files portions of its Motion to Unseal, Moskowitz Declaration, and Exhibits A-J

1 accompanying the Moskowitz Declaration, under seal because they reflect information regarding
2 the same customers covered by that order.

3
4 Dated: June 30, 2025

Respectfully submitted,

5 By: /s/ Lauren A. Moskowitz

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